

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

GLOBAL FORCE)
ENTERTAINMENT, INC. and)
JEFFREY JARRETT)
Plaintiffs/)
Counter-Defendants,) CIVIL ACTION NO.
v.) 3:18-cv-00749
)
ANTHEM WRESTLING)
EXHIBITIONS, LLC,)
Defendant/)
Counter-Plaintiff.)

--- This is the Videotaped Deposition of ED
NORDHOLM, taken at the offices Neesons, a
Veritext Company, 77 King Street West, Suite
2020, Toronto, Ontario, Canada, on the 12th day
of November, 2019.

1 also a corporate title.

2 Q. So what is that title?

3 A. I'm the president of Anthem
4 Wrestling, I'm currently the chief corporate
5 officer of Anthem Sports & Entertainment Canada
6 and of Anthem Sports & Entertainment Delaware.

7 Q. Who do you report to?

8 A. I report in the context of
9 Anthem Wrestling to -- there's a board of
10 managers. And then in the context of Anthem
11 general corporate I report to Mr. Asper.

12 Q. Who is on the board of managers
13 for Anthem Wrestling?

14 A. Myself, Mr. D'Amore, Leonard
15 Asper, Niral Merchant and Peter Einstein.

16 Q. You said you report to this board
17 of managers. You're the president. What role
18 does Mr. D'Amore hold, or what title does he
19 hold?

20 A. Mr. D'Amore is an independent
21 contractor as well, but he has the title of
22 executive vice president of Anthem Wrestling.

23 Q. So you -- among other people you
24 report to -- you as the president report to the
25 executive vice president?

1 October 31, 2018.

2 Q. And you are both an officer of
3 Anthem Sports & Entertainment Canada and Anthem
4 Wrestling, correct?

5 A. Yes.

6 Q. And you're actually paid by
7 Anthem Sports & Entertainment Canada, correct?

8 A. Yes.

9 Q. And yet you're the president of
10 Anthem Wrestling, correct?

11 A. Correct.

12 Q. So someone that is paid by Anthem
13 Sports & Entertainment Canada to run Anthem
14 Wrestling is not exerting control over the daily
15 affairs of Anthem Wrestling?

16 A. I exercise control as an officer
17 of Anthem Wrestling.

18 Q. Even though you're unpaid?

19 A. Recognizing my fiduciary duty is
20 to Anthem Wrestling in that capacity.

21 Q. Even though you're not paid by
22 Anthem Wrestling?

23 A. Well, Anthem Wrestling is --
24 bears my expense. Whether I get paid in Canada
25 it's -- that salary is charged to Anthem

1 Wrestling.

2 Q. So is there a services agreement
3 between Anthem Wrestling and Anthem Sports &
4 Entertainment Canada for your services?

5 A. Just intercompany accounting, my
6 salary and the salary of the Toronto people that
7 are focused on Impact Wrestling or Anthem
8 Wrestling are charged back to Anthem Wrestling.

9 Q. So there is some shared
10 accounting among the entities?

11 A. Not shared accounting. There's
12 a -- charges back-and-forth, yes. It doesn't
13 change -- the books and records are kept
14 separate.

15 Q. So it's a paper transaction; it's
16 not a -- not anything other than that. Is that
17 what you're saying?

18 A. What do you mean by "paper
19 transaction"?

20 Q. Well, it's recorded -- you take a
21 credit on our books and then a debit on their
22 books, right?

23 A. For the salaries of the people
24 that are employed almost -- like, that are
25 employed on the Anthem Wrestling business.

REPORTER'S CERTIFICATE

I, HELEN MARTINEAU, CSR, Certified
Shorthand Reporter, certify;

That the foregoing proceedings were
taken before me at the time and place therein
set forth at which time the witness was put
under oath by me;

That the testimony of the witness and
all objections made at the time of the
examination were recorded stenographically by me
and were thereafter transcribed;

That the foregoing is a true and
accurate transcript of my shorthand notes so
taken. Dated this 25th day of November, 2019.

A handwritten signature in blue ink, appearing to read "H. Martineau", is written over a horizontal line.

PER: HELEN MARTINEAU
CERTIFIED SHORTHAND REPORTER